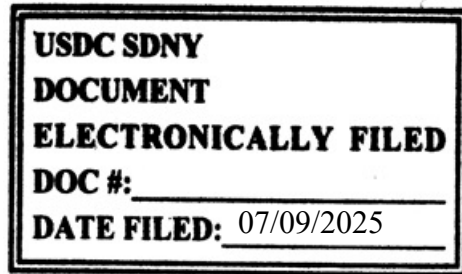




U.S. Department of Justice

United States Attorney
Southern District of New York



86 Chambers Street
New York, New York 10007

July 8, 2025

The Court thanks the parties for their update. The next status update shall be due August 8, 2025.

SO ORDERED:

07/09/2025

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

Re: *International Refugee Assistance* *Citizenship and*
Immigration Services, et al., No. 23 Civ. 1236 (KHP)

Dear Judge Parker:

This Office represents Defendants United States Citizenship and Immigration Services (“USCIS”) and the Department of State (“State,” and together with USCIS, the “Government”) in the above-referenced Freedom of Information Act (“FOIA”) action. We write jointly with Plaintiff International Refugee Assistance Project, Inc. (“IRAP”) in response to the Court’s order to file a joint status report on the eighth day of each month, or if that date is a weekend or public holiday, then on the following Monday.

This matter concerns FOIA requests IRAP submitted to State and USCIS. The USCIS request seeks records for case management software systems used or accessed by USCIS to process a refugee for resettlement to the United States through the U.S. Refugee Admissions Program. The State request seeks the same records with respect to State (“Part One” of the State request), as well as anonymized data from individual refugee cases (“Part Two” of the State request).

With respect to USCIS, as we have noted in previous status reports, USCIS made a release of identified responsive records in July 2023. In recent months, the parties have been discussing whether it is necessary for USCIS to run additional searches. Based on these discussions, in mid-June, USCIS made an additional production to plaintiff.¹ Furthermore, USCIS has gathered an additional set of records and plans to make another production by the end of July. The parties continue to discuss these issues in an effort to determine whether they can be resolved without litigation.

With respect to Part One of the State request, State is continuing to process records it located in its search. State made its eighteenth production of records responsive to Part One of the State request on June 13, 2025, and it anticipates making its nineteenth production of such records by July 25, 2025. State anticipates that it will complete productions by this September. As State’s

¹ The initial production was lost in transmission by the carrier. The agency has provided a replacement production, which according to tracking information was delivered today.

processing nears completion, IRAP is reviewing State's productions to determine whether it has any questions about the agency's asserted exemptions. If so, the parties plan to discuss such issues between themselves to determine if they can be resolved without litigation.

With respect to Part Two of the State request, as we noted in previous status reports, State produced data via CD mailed to IRAP on May 6, 2025. IRAP is continuing to review this production.

The parties thank the Court for its consideration of this joint status report and will file their next joint status report by August 8, 2025. If any issue becomes ripe for summary judgment motion practice in the meantime, the party seeking to file the motion will request a pre-motion conference with the Court.

Respectfully,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Peter Aronoff
PETER ARONOFF
ALYSSA B. O'GALLAGHER
Assistant United States Attorneys
Tel.: (212) 637-2697/2822
Email: Peter.Aronoff@usdoj.gov
Alyssa.O'Gallagher@usdoj.gov